

United States District Court  
Eastern District of Washington

Leland Owens

FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

SEP 03 2024

SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON

(In the space above enter the full name(s) of the plaintiff(s).)

1:24-cv-03134-TOR

Case No. \_\_\_\_\_  
(To be filled out by Clerk's  
Office only)

-against-

World Wrestling Entertainmen

Ultimate Fighting Championship

**COMPLAINT**

Jury Demand?

☐ Yes

☐ No

(In the space above enter the full name(s) of the defendant(s).  
If you cannot fit the names of all of the defendants in the  
space provided, please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section I. Do not include  
addresses here.)

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

**I. PARTIES IN THIS COMPLAINT****Plaintiff**

*List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.*

Plaintiff: Owens, Leland H  
 Name (Last, First, MI)  
408 Skow Street  
 Street Address  
Wapato WA 98951  
 County, City State Zip Code  
509-759-9799  
 Telephone Number

**Defendant(s)**

*List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.*

Defendant 1: World Wrestling Entertainment  
 Name (Last, First)  
1241 E Main Street  
 Street Address  
Stamford CT 06902  
 County, City State Zip Code

Defendant 2: Ultimate Fighting Championship  
 Name (Last, First)  
6650 S Torrey Pines DR  
 Street Address  
Las Vegas NV 89118  
 County, City State Zip Code

**Defendant(s) Continued**

Defendant 3:

\_\_\_\_\_  
Name (Last, First)

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
County, City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

Defendant 4:

\_\_\_\_\_  
Name (Last, First)

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
County, City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

**II. BASIS FOR JURISDICTION**

*Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### III. VENUE

*This court can hear cases arising out of the Eastern District of Washington.*

*Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.*

Venue is appropriate in this Court because:

The events happened here, The verbal agreement between me and the World Wrestling Entertainment. In the Yakima Lower Valley.

### IV. STATEMENT OF CLAIM

Place(s) of  
occurrence: 408 Skow Street

Date(s) of occurrence: August 6, 2013

*State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.*

#### FACTS:

I gave the WWE ideas and never got paid. I also told Daniel Bryan (at the time what i was going to do with my earning with said ideas and the World Wrestling Entertainment tried to get in front of it because Vince thinks of this as competition. We have a verbal agreement in which was supposed to talk about at the time i receive my payment for my ideas.

What  
happened to  
you?

Daniel Bryan

Sasha Banks

I believe Vince McMahon

Was  
anyone  
else  
involved?

World Wrestling Entertainment sent Daniel and Sasha (Now known as Mercedes Mone with AEW) to send me a check of 100,000 as Hush Money for a comment made by Vince's daughter Stephanie about my Daughter's name "Marley" in which I turned down. Then I told Daniel and Mercedes about my ideas I've submitted through Instagram to Stephanie's Husband Paul Levesque. I also gave ideas too upfront to Daniel and Mercedes. Some of which I stated I was going to use with my Company PIE, such as "Stomping Grounds" I was going to use for my Cage Match. Among other ideas.

Who did  
what?

## V. INJURIES

*If you sustained injuries related to the events alleged above, describe them here.*

Mental Stress, Such as Anxiety, Anger & Sadness due to them already starting TKO in which  
every idea he had for TKO is what i had for P!E

## VI. RELIEF

The relief I want the court to order is:

☐ Money damages in the amount of: \$ \_\_\_\_\_

☒ Other (explain):

I just want what is Fair and Accurate with all my ideas In which i Am also  
requesting a printout of all my ideas and a Cease and Desist for all things  
TKO, As well as All my Ideas pulled completely.

**VII. CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

8/27/24

Dated

Leland Owens

Plaintiff's Signature

owens, Leland H

Printed Name (Last, First, MI)

408 Skow StreetWapatoWA98951

Address

City

State

Zip Code

09-759-9799

Telephone Number

*List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.*